

**NETWORK DEPOSITION SERVICES**  
**Transcript of Alan Hall**

1

1           IN THE UNITED STATES DISTRICT COURT  
2           FOR THE MIDDLE DISTRICT OF PENNSYLVANIA

3       ROBERT STOUD,                                 :  
  :  
4           Plaintiff                                :IN THE COURT OF COMMON  
  :PLEAS OF LACKAWANNA  
  :COUNTY  
5           vs.                                       :  
  :JURY TRIAL DEMANDED  
6       SUSQUEHANNA COUNTY,                       :  
         COMMISSIONER ELIZABETH                 :NO. 3:17-CV-2183  
7       ARNOLD, AND                                 :  
         COMMISSIONER MARYANN                    :  
8       WARREN                                       :  
  :  
9           Defendants                                :

10   - - -

11                         DEPOSITION OF ALAN HALL  
12                         Thursday, December 10, 2020

13   - - -

14  
15           The deposition of ALAN HALL, called as a  
16       witness by the Plaintiff, pursuant to notice and  
17       the Pennsylvania Rules of Civil Procedure  
18       pertaining to the taking of depositions, taken  
19       before me, the undersigned, Trisha Sims, a Notary  
20       Public in and for the Commonwealth of  
21       Pennsylvania, at the offices of Mazzoni, Karam,  
22       Petorak & Valvano, Bank Towers, Suite 201,  
23       321 Spruce Street, Scranton, Pennsylvania 18503,  
24       on Thursday, December 10, 2020, commencing at  
25       10:31 a.m., the day and date above set forth.

21   - - -

22  
23                         NETWORK DEPOSITION SERVICES  
24                         SUITE 1101, GULF TOWER  
25                         707 GRANT STREET  
                          PITTSBURGH, PENNSYLVANIA 15219  
                          412-281-7908

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1 APPEARANCES:

2

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11 -- Representing the Plaintiff

12

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21 -- Representing the Defendants

22

23

24 ALSO PRESENT:

25 Robert Stoud

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1     thing.

2                   If you don't hear my question, let me  
3     know.  If you don't understand my question, let me  
4     know.  Otherwise, I'm going to assume that you've  
5     heard and understood the question.

6                   Okay?

7           A.     Okay.

8           Q.     We have the stenographer here, and the  
9     stenographer is going to take down everything that  
10    we say.  She can't take down a nod of the head or  
11    any physical gestures.  So I'd ask that all your  
12    responses be verbal.

13          A.     All right.

14          Q.     We're here just for a narrow purpose  
15    today, in that we've already taken your  
16    deposition; and that narrow purpose is, there was  
17    a complaint that was filed in the United States  
18    District Court for the Middle District of  
19    Pennsylvania by Michael Giangrieco --

20          A.     Okay.

21          Q.     -- that alleged that falsehoods were  
22    being filed and falsehoods were being portrayed by  
23    representatives of Susquehanna County.  That's  
24    what we're here for today.

25                   Okay?

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1           A.     Okay.

2           Q.     So I'm going to hand you what --  
3 something that was sent to me yesterday by  
4 Attorney Hailstone. We're going to mark this as  
5 Plaintiff's Exhibit 1, and I'm going to give that  
6 to you.

7                     (Plaaintiff's Exhibit 1, Letter written  
8 by Alan Hall, was marked for identification.)

9 BY MR. KARAM:

10          Q.     And are you familiar with that  
11 document?

12          A.     I have to read it now and let you know.

13          Q.     Okay. Take your time.

14                     (Pause in proceedings.)

15                     THE WITNESS: Okay.

16 BY MR. KARAM:

17          Q.     Are you familiar with that document?

18          A.     Yes, I am.

19          Q.     Do you know who the author of that  
20 document is?

21          A.     I am.

22                     MR. HAILSTONE: Before we get into it,  
23 just for the record, I object to the use of this  
24 document. It's attorney work product,  
25 attorney-client work product, and it's privileged;

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1     and I need to put that objection on the record.

2                   I also note that when I sent it to  
3     Attorney Karam, I noted that there was an  
4     objection to the use of these documents; but I  
5     think out of a need to get to the bottom and be  
6     done with this issue, I sent it anyway.

7                   MR. KARAM:   And that's accurate.   So we  
8     can proceed.

9     BY MR. KARAM:

10            Q.     Who did you send this to?

11            A.     It originally was sent to the CCAP  
12     claims adjuster.

13            Q.     Do you know the CCAP claims adjustor's  
14     name?

15            A.     There was three of them.   The two of  
16     them I remember was Cassie Troup and Jennifer  
17     Ulsh.

18            Q.     And you don't recall the third one?

19            A.     I don't recall the third.

20            Q.     And was this also sent to Attorney  
21     Robin Read?

22            A.     I did not send it to Robin Read.

23            Q.     And I take it that if you authored this  
24     and this was sent to the CCAP adjustors that you  
25     believe everything contained in this is truthful?

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1           A.     My opinion, yes.

2           Q.     What caused you to write this letter?

3           A.     The position -- as it says in the first  
4 paragraph, the position paper that was drafted by  
5 Robin Read I didn't agree with. I felt that it  
6 left out certain facts and was misleading.

7           Q.     Okay. When did you send this?

8           A.     I can't recall the exact date. It was  
9 probably within a month after she filed the  
10 position paper.

11          Q.     And by what means did you send this to  
12 the claims adjustors at CCAP?

13          A.     By personal email.

14          Q.     So this was an email message?

15          A.     Yes.

16          Q.     Are you aware of any other emails that  
17 you may have sent to CCAP as it relates to either  
18 Robert Stoud or Maggie McNamara?

19          A.     Not that I can recall.

20          Q.     Did you discuss this email with anyone  
21 else prior to sending it or subsequent to sending  
22 it?

23          A.     Discussion was with our Solicitor  
24 Giangrieco and Commissioner Warren.

25          Q.     And can you tell me about those



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1 discussions?

2 MR. HAILSTONE: Object to any  
3 discussion with former Solicitor Giangrieco as  
4 privileged.

5 BY MR. KARAM:

6 Q. You can go ahead.

7 A. As far as Commissioner Warren, it  
8 was -- both of us had prepared documents, and we  
9 reviewed each other's documents to make sure that  
10 they were accurate in what we thought was the  
11 basis.

12 Q. When you say "documents," you're  
13 talking about this email?

14 A. This email, yes.

15 Q. So I'm going to show you what we're  
16 going to mark as Plaintiff's Exhibit 2.

17 (Plaintiff's Exhibit 2, Letter written  
18 by MaryAnn Warren, was marked for identification.)

19 BY MR. KARAM:

20 Q. And I would ask that you take the time  
21 to review that and let us know if you're familiar  
22 with that document.

23 (Pause in proceedings.)

24 THE WITNESS: Okay. Yes.

25 BY MR. KARAM:

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1 Q. Are you familiar with that document?

2 A. Yes, I am.

3 MR. HAILSTONE: Same objection as the  
4 other document.

5 BY MR. KARAM:

6 Q. Can you tell me what it is?

7 A. This was the letter in response to the  
8 position paper that MaryAnn Warren wrote.

9 Q. And you've reviewed it here today?

10 A. Uh-huh.

11 Q. And do you have any opinion on the  
12 truthfulness of that document?

13 A. My opinion is that she wrote the  
14 document based on her opinion as to the facts, as  
15 well as I did.

16 Q. Okay. Okay. I'm going to hand you  
17 what we're going to mark as Plaintiff's Exhibit 3.

18 (Plaintiff's Exhibit 3, Letter dated  
19 5/13/17 written by Robin A. Read, Esquire, was  
20 marked for identification.)

21 BY MR. KARAM:

22 Q. And I will say to you that this was a  
23 May 13, 2017, letter that was sent and filed with  
24 the EEOC in response to Robert Stoud's EEOC  
25 complaint.

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1           A.     Uh-huh.  Yes.

2           Q.     Are you familiar with that document?

3           A.     Yes, I am.

4           Q.     Okay.  And is that the document that  
5 your email is responding to?

6           A.     Yes.

7           Q.     And is that the document that your  
8 email is indicating there's been falsehoods made?

9           A.     I think I said -- my correct words  
10 were, I said it's to clarify and correct  
11 statements that have been made.

12          Q.     In other words, there's incorrect  
13 statements in Plaintiff's Exhibit No. 3, the  
14 response?

15          A.     Correct.

16          Q.     The purpose of your email was to  
17 correct inaccuracies or the incorrect statements  
18 that were made in the May 13, 2017, response?

19          A.     Correct.

20          Q.     Outside of these emails and letters,  
21 who did you talk to concerning the inaccuracies in  
22 Plaintiff's Exhibit No. 3?

23          A.     It was our Solicitor Mike Giangrieco,  
24 Commissioner MaryAnn Warren, a brief conversation  
25 with the HR director Jeanne Conklin and Jennifer

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1     Ulsh and Cassidy Troup from CCAP.

2           Q.     Can you tell me about your  
3     conversations with Jennifer Ulsh and Cassidy Troup  
4     from CCAP?  When did they occur, and what was the  
5     context?

6           A.     The conversation that myself and  
7     Attorney Giangrieco had with Jennifer and Cassidy  
8     about the position paper and that we felt that the  
9     position paper needed to be clarified and that we  
10    felt that there were statements in there that  
11    didn't -- weren't accurate and needed to be  
12    corrected.  So that's pretty much what the  
13    conversation was.

14          Q.     What was their response?

15          A.     Their response was -- at that time was  
16    to -- they understood that we had a difference of  
17    opinion and they felt, in their words, that their  
18    attorney did what they were supposed to do and  
19    they said that we should go along with the  
20    document.

21          Q.     Was it let known to Cassidy or --  
22    Jennifer and Cassidy that you and MaryAnn  
23    constituted a majority of the county commissioners  
24    of Susquehanna County?

25          A.     Yes.

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1           Q.     And that as a majority -- well, what  
2     does that mean to you, that a majority of the  
3     county commissioners were indicating to CCAP that  
4     a document was filed on behalf of the County of  
5     Susquehanna that contained inaccuracies and needed  
6     to be corrected?

7           A.     Ask that question again.

8           Q.     What does it mean to you -- strike all  
9     that.

10                   In the County of Susquehanna, if a  
11     majority of the commissioners decide to handle a  
12     legal case in a certain way and the minority wants  
13     to handle it in a different way, who prevails, to  
14     your understanding?

15                   MR. HAILSTONE: I object. You're  
16     asking questions about the authority of the  
17     commissioners, the county commissioners. They  
18     vote in public meetings. The majority wins out at  
19     public meetings. We're not talking about a public  
20     meeting or anything where votes were held.

21                   MR. KARAM: Votes are held in executive  
22     sessions on legal matters as well.

23                   MR. HAILSTONE: Legal matters -- okay.  
24     Have we established that there was a vote in an  
25     executive session?

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1                   MR. KARAM: No. I'm not there yet.  
2 I'm not there yet. What I'm establishing is that  
3 two county commissioners contacted CCAP and told  
4 them that they filed a false document and that  
5 CCAP is telling the county commissioners we really  
6 don't care because we're just going to listen to  
7 the minimum majority.

8                   MR. HAILSTONE: You're misinterpreting  
9 what he said.

10 BY MR. KARAM:

11           Q. Let me ask you that.

12           A. Let me clarify. First of all, this  
13 isn't a county commissioners' decision. It's the  
14 insurance company's decision. They're the ones  
15 that handled this. That's what they're paid for,  
16 not the county commissioners.

17           Q. Well, who --

18           A. You've got to let me finish.

19           Q. I want you to.

20           A. Okay. So the county commissioners are  
21 under contract with CCAP. CCAP handles our  
22 insurance, which this falls under our insurance.

23                   When they have handle those, it's our  
24 responsibility to allow them to handle the cases  
25 the way they see fit.

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1           We are responsible to provide them the  
2   information they request, any support; but come to  
3   the end of the road, CCAP has a decision to make  
4   as to how the case is done.

5           Q.     And you have no role or input in how  
6   CCAP handles the case?

7           A.     Correct. Our role would be, if we  
8   wanted to have control of the case, then CCAP  
9   would bow out and the county commissioners would  
10   have to take full responsibility for the case.

11          Q.     And how about settlement of cases? Who  
12   controls the settlement of cases? CCAP or the  
13   county commissioners?

14          A.     In the settlement, it depends on the  
15   issue itself. In this case, in the original  
16   agreement that CCAP made when we first started it  
17   back in 2016 or '17, CCAP was paying for the whole  
18   thing.

19          Q.     So would the county commissioners have  
20   input into whether a case would settle or not?

21          A.     Only if the County Commissioners  
22   Association came us to and asked us to pony up and  
23   spend money.

24          Q.     And are you aware if they did that in  
25   this case?

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1           A.     My understanding -- I was not involved  
2     in the last negotiations. So I don't know what  
3     happened. That was long before me.

4           Q.     Why weren't you involved in the last  
5     one?

6           A.     Because there was a change in the  
7     chairman at the County; and when the chairman  
8     shift changed, the new chairperson decided that  
9     they needed to be involved in it instead of me.

10          Q.     But you're still a commissioner,  
11     correct?

12          A.     One out of three, yes.

13          Q.     So let's get back to your conversation  
14     with the CCAP people. Did they tell you that they  
15     didn't believe what you wrote in your email?

16          A.     I can't -- the exact words I can't tell  
17     you; but the summary of it was that they  
18     understand our position, but they believe that the  
19     position that the attorney wrote was accurate.

20          Q.     Did you ever talk to the attorney and  
21     let her know that you believed her response was  
22     inaccurate?

23          A.     No, I did not.

24          Q.     When you were talking to CCAP, it was  
25     just you, Mike Giangrieco and the two adjustors,



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1     claims adjustors?

2           A.     Well, there was somebody else from  
3     CCAP. I don't know who else was on the phone, and  
4     I can't remember if MaryAnn was with me at that  
5     time or not.

6           Q.     And how many times did you talk to CCAP  
7     about this case?

8           A.     About that incident, once.

9           Q.     Did they ask you to sign off on their  
10    position?

11          A.     No. I've never signed off on anything.

12          Q.     There came a point in time when Robin  
13    Read, who was the counsel of record for the EEOC,  
14    was relieved of her responsibilities of  
15    representing Susquehanna County.

16          A.     Uh-huh.

17          Q.     Do you know why that happened?

18          A.     Well, that was a decision CCAP made.  
19    She was employed by CCAP. So they're the ones  
20    that made the decision to remove her.

21          Q.     Did you have any input into that? Did  
22    you make any recommendations to that? Did you  
23    have any conversations concerning that?

24          A.     We did have a conversation with, again,  
25    those individuals I mentioned before, Cassidy and

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1 Jennifer, that we didn't feel that she was  
2 representing our county's best interest and we  
3 wanted somebody else on the case.

4 Q. And why didn't you feel she was  
5 representing your county in its best interest?

6 A. Because she had written a position  
7 paper for the county that we weren't entirely  
8 100 percent agreeing upon, nor did we ever see it  
9 before she filed it.

10 Q. And what was Cassidy and Jennifer's  
11 response to that?

12 A. They said at the time in the  
13 conversation that they would review it; and then  
14 later, we were notified that Attorney Hailstone  
15 was running the case.

16 Q. So we just got these letters yesterday.  
17 Prior to yesterday, can you tell me the entire  
18 universe of people who were aware of your email  
19 and MaryAnn Warren's email, or letter, whatever it  
20 is? I'm assuming Mike Giangrieco was one.

21 A. Yes.

22 Q. Who else in the universe of people knew  
23 about these letters?

24 A. Well, again, I couldn't answer that  
25 question. I don't know who tells who and who

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1     Giangrieco told or anybody else.

2           Q.     Just in terms of people you talked to  
3     or communicated to anywhere, any time, from the  
4     date you sent the email until today.

5           A.     Well, of course, the people at CCAP and  
6     Attorney Hailstone.

7           Q.     Attorney Hailstone knew about these  
8     letters?

9           A.     Yes.

10          Q.     When did he find out about the letters?

11          A.     I can't tell you the exact date.

12          Q.     Well, was it a week ago, a month ago, a  
13     year ago?

14          A.     It was awhile ago. I can't remember  
15     the exact date.

16          Q.     Was he given a copy of the letters?

17          A.     He was sent an email with the  
18     information.

19          Q.     Who sent him the email?

20          A.     I did.

21          Q.     You sent him an email with a copy of  
22     your email?

23          A.     Yes.

24          Q.     How about MaryAnn Warren's?

25          A.     No. I didn't send hers.

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1           Q.     To be fair, this was an email that was  
2 sent to CCAP?

3           A.     Right.

4           Q.     It wasn't sent to Robin Read?

5           A.     Correct.

6           Q.     And it was from you, as a county  
7 commissioner, to CCAP?

8           A.     Correct.

9           Q.     Other than Attorney Hailstone -- and,  
10 again, this email was sent over a year ago?

11          A.     I don't know the exact date.

12          Q.     And are you able to retrieve that  
13 email?

14          A.     Yes.

15          Q.     During any of these meetings, do you  
16 recall anybody taking notes? When I say  
17 "meetings," during your conversations with CCAP,  
18 did anybody take notes?

19          A.     Our conversations with CCAP were over  
20 the phone. So I don't know what they were doing.

21          Q.     But you didn't take notes?

22          A.     No.

23          Q.     Okay. And you're not aware of MaryAnn  
24 Warren taking notes?

25          A.     No.

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1           Q.     In terms of Jeanne Conklin and MaryAnn  
2 Warren, did you ever have any conversations with  
3 them where they indicated that they felt they were  
4 being pressured to lie?

5           A.     No. I think they're -- I think if you  
6 look at their letters -- I mean, if you look at  
7 MaryAnn's letter, it would pretty much tell you  
8 how she felt about it.

9           Q.     I'm going to show you what we have  
10 marked as Plaintiff's Exhibit 4, and I'm going to  
11 purport to you that this is a letter or an email  
12 dated June 15, 2017, from Jeanne Conklin. I would  
13 ask that you review that.

14                   (Plaintiff's Exhibit 4, Letter dated  
15 6/15/17 from Jeanne Conklin, was marked for  
16 identification.)

17                   (Pause in proceedings.)

18                   THE WITNESS: Okay.

19 BY MR. KARAM:

20           Q.     Is there anything in that document that  
21 you have knowledge is inaccurate?

22           A.     I believe this represents Jeanne's  
23 opinion, yes.

24           Q.     But do you have any knowledge of any  
25 inaccuracies contained in that letter?

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1           A.     Not to my knowledge.

2           Q.     Can we say the same about MaryAnn  
3 Warren's letter?

4           A.     What's that?

5           Q.     That you're not aware of any  
6 inaccuracies in MaryAnn Warren's letter, which  
7 would be Plaintiff's Exhibit No. 2?

8           A.     I believe both of them represent their  
9 opinion of the facts that occurred.

10          Q.     And you do not have any knowledge of  
11 any inaccuracies in either of those letters?

12          A.     Well, there's certain things in their  
13 letters I wasn't a part of. So I wouldn't have  
14 knowledge of those issues.

15          Q.     So you have no knowledge of any  
16 inaccuracies?

17          A.     I have no knowledge of any  
18 inaccuracies.

19                   (Plaintiff's Exhibit 5, Complaint, was  
20 marked for identification.)

21 BY MR. KARAM:

22          Q.     Okay. I'm going to show you what we  
23 have marked as Plaintiff's Exhibit No. 5. I'm  
24 going to indicate to you that this is a complaint  
25 that Michael Giangrieco filed against Susquehanna

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1 County, Elizabeth Arnold and Judith Herschel.

2 I'm going to call your attention to  
3 paragraph No. 11. It states: During Arnold's  
4 first term as county commissioner, Mr. Giangrieco  
5 spoke to her repeatedly about actions she was  
6 taking that were not only contrary to Susquehanna  
7 policy, but potentially exposed Susquehanna County  
8 to liability and did ultimately cause the county  
9 liability.

10 Do you have any knowledge regarding the  
11 truthfulness of that allegation?

12 MR. HAILSTONE: I'm going to object.  
13 This is not what Judge Mannion's order allowed.  
14 Judge Mannion's order was very clear about the  
15 allegations -- I think they're in 15 through 18 --  
16 regarding his claim that he was told to lie or  
17 Commissioner Arnold told him to lie.

18 This is clearly information that County  
19 Solicitor Giangrieco should not be sharing because  
20 it's protected by attorney-client privilege. He  
21 had no right to do that.

22 BY MR. KARAM:

23 Q. You can answer.

24 A. What was your question?

25 Q. Is paragraph 11 true to your knowledge?

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1           A.     I would say that you need to talk to  
2     Mr. Giangrieco about that.

3           Q.     Well, let me ask this: Were you aware  
4     that Attorney Giangrieco spoke to her regarding  
5     actions she was taking that were contrary to  
6     Susquehanna County policy?

7           A.     That's in the first deposition that we  
8     did.

9           Q.     Is that a yes?

10          A.     The first deposition that you took from  
11     me, we made a statement in there that, you know,  
12     she had been given letters saying that, you know,  
13     she needed to follow policies and not expose the  
14     county to risk.

15          Q.     Okay. Paragraph 15: The attorney for  
16     the county's insurance company prepared documents  
17     in response to the EEOC complaint which were false  
18     and inaccurate and did not reflect the facts given  
19     to her by Mr. Giangrieco and others.

20                   To your knowledge, is that a truthful  
21     statement?

22          A.     Well, if Mr. Giangrieco feels that way,  
23     it may be truthful to him.

24          Q.     Well, let's take Mr. Giangrieco out of  
25     that and let's put Commissioner Hall in the place



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1 of Mr. Giangrieco's name. Would that be an  
2 accurate statement?

3 A. The statement was?

4 Q. The attorney for the county's insurance  
5 company prepared documents in response to the EEOC  
6 complaint which were false and inaccurate and did  
7 not reflect the facts given to her by Commissioner  
8 Hall.

9 A. I would say that the attorney for the  
10 county's insurance company prepared the documents  
11 in response to the EEOC complaint and that I felt  
12 that they needed to be clarified and correct  
13 statements needed to be made.

14 Q. Paragraph 17 indicates: Mr. Giangrieco  
15 and other employees were asked to lie.

16 Are you aware of anyone, other than  
17 Mr. Giangrieco, who was an employee of Susquehanna  
18 County that was asked to lie?

19 A. Well, I guess the definition of lie  
20 would be correct because you have Jeanne Conklin's  
21 response here that said she was pressured in the  
22 statement. You have MaryAnn Warren's saying that  
23 she was pressured, and you had my statement that I  
24 said that they told us that we needed to go along  
25 with what they wanted to do.

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1           Q.     Anybody other than those three?

2           A.     No.

3                   MR. KARAM:   Okay.   Let's take a  
4   couple-of-minute break, and I think we're close to  
5   the end.

6                               (A brief recess was taken.)

7   BY MR. KARAM:

8           Q.     Did Attorney -- are you aware or did  
9   you have any discussions with Attorney Giangrieco  
10   about him sending a letter or email similar to the  
11   one that you sent and MaryAnn Warren sent and that  
12   Jeanne Conklin sent?

13          A.     The conversations that I recall with  
14   him was that he had told us that -- I told him I  
15   was thinking about writing a letter in response to  
16   what we had found.

17                   MR. HAILSTONE:   Before you answer, I'm  
18   going to put another objection on the record.  
19   This is a discussion between an attorney and his  
20   client, and you shouldn't be asking questions  
21   regarding that.   I object to it.   You can answer.

22                   THE WITNESS:   So in that conversation,  
23   I said, you know, I think I need to write a  
24   letter; and Giangrieco, our solicitor at the time,  
25   said, well, you guys should all write letters if

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1     you disagree. He said -- I can't remember at that  
2     point whether he said he was going to or he wasn't  
3     going to -- I'm trying to think that he said he  
4     wasn't going to because he was a solicitor, but he  
5     may have. I don't have any knowledge of it.

6                   MR. KARAM: Okay. I have nothing else.

7                   MR. HAILSTONE: No questions.

8                   (Witness excused.)

9                   (Deposition concluded at 11:13 a.m.)

10                                 \* \* \*

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1 C E R T I F I C A T E

2 COMMONWEALTH OF PENNSYLVANIA )  
3 ) SS:  
4 COUNTY OF MONROE )

5

I, Trisha Sims, do hereby certify  
that before me, a Notary Public in and for the  
Commonwealth aforesaid, personally appeared ALAN  
HALL, who then was by me first duly sworn or  
affirmed to testify the truth, the whole truth,  
and nothing but the truth in the taking of his/her  
oral deposition in the cause aforesaid; that the  
testimony then given by him/her as above set forth  
was by me reduced to stenotypy in the presence of  
said witness and afterwards transcribed by means  
of computer-aided transcription.

10

I do further certify that this  
deposition was taken at the time and place in the  
foregoing caption specified, and was completed  
without adjournment.

13

I do further certify that I am not a  
relative, counsel or attorney of either party or  
otherwise interested in the event of this action.

15

IN WITNESS WHEREOF, I have hereunto set my  
hand and affixed my seal of office on this  
29th day of December, 2020.

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\_\_\_\_\_  
Trisha J. Sims, Notary Public  
In and for the Commonwealth of Pennsylvania  
My commission expires June 6, 2024

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